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6 UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF WASHINGTON

8 THE ESTATE OF CINDY LOU HILL,
9 by and through its personal
10 representative, Joseph A. Grube,

11 Plaintiff,

12 v.

13 NAPHCARE, INC, an Alabama
14 corporation; and SPOKANE COUNTY,
15 a political subdivision of the State of
16 Washington,

17 Defendants.

NO. 2:20-cv-00410-MKD

MOTION TO APPEAR PRO HAC
VICE

18 **ATTORNEY MOTION TO APPEAR PRO HAC VICE TO ALL PARTIES**
19 **HEREIN AND TO THEIR ATTORNEYS OF RECORD**

20 Pursuant to Local Rule 83.2(c)(1), Defendant hereby applies for Edward J.
21 McNelis, III of Sands Anderson PC to be permitted by this Court to appear as
22 counsel *pro hac vice* in this matter on behalf of Defendant NAPHCARE, INC.
23 ("Defendant.").

24
25 PRO HAC VICE- 1

FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN SPILLANE, PLLC
701 Fifth Avenue, Suite 4750
Seattle, WA 98104
p. 206-749-0094 • f. 206-749-0194

- 1 1. Edward J. McNelis, III is an attorney practicing with the law firm of
2 Sands Anderson, PC, 1111 E. Main St., P.O. Box 1998, Richmond,
3 Virginia 23218-1998; telephone no. (804) 648 -1636.
- 4 2. Edward J. McNelis, III was admitted to the State Bar of Virginia (VSB
5 No. 34003) and the following courts on the following dates:
 - 6 a. United States District Court for the Eastern District of Virginia
 - 7 b. United States District Court for the Western District of Virginia
 - 8 c. United States Court of Appeals for the Fourth Circuit
 - 9 d. United States District Court for the District of Colorado
 - 10 e. Pennsylvania (admitted in 1989)
 - 11 f. West Virginia (admitted in 2000)
- 12 3. Edward J. McNelis, III will be associated in this case with the following
13 counsel who have been admitted to the United States Eastern District of
14 Washington: Ketia B. Wick, WSBA #27219 and Erin Ehlert,
15 WSBA#26340 of FAIN ANDERSON VANDERHOEF ROSENDAHL
16 O'HALLORAN SPILLANE, PLLC, 701 Fifth Avenue, Suite 7430,
17 Seattle, WA 98104, telephone no. (206) 749-0094. Said counsel will sign
18 all pleadings, motions and other papers prior to filing and will
19 meaningfully participate in this action.
- 20 4. Because admitting Edward J. McNelis, III pro hac vice to participate in
21 trial will cause neither delay nor prejudice to any of the parties,
22 Defendant NaphCare, Inc. respectfully asks that this motion be granted.
- 23 5. Edward J. McNelis, III is a member in good standing in all of the above-
24 referenced courts. Edward J. McNelis, III does not have any pending
25

1 disciplinary actions and has never been subject to any disciplinary
2 sanctions by any court or bar association.

3 6. Plaintiff does not object to the relief requested in this motion.

4 Defendant respectfully requests that the Court permit Edward J. McNelis,
5 III to appear pro hac vice for Defendant in this matter

6 DATED this 1st day of July, 2022.

7
8 /s/Ketia Wick

9 Ketia B. Wick, WA #27219

10 Erin Ehlert, WA#26340

11 Attorneys for Defendant NaphCare, Inc.

12 Fain Anderson VanDerhoef Rosendahl

13 O'Halloran Spillane PLLC

14 701 Fifth Avenue, Suite 4750

15 Seattle, WA 98104

16 Phone: (206) 749-0094

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Counsel for Plaintiffs

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DATED this 1st day of July, 2022.

/s/Kenya Owens

Kenya Owens, Legal Assistant